

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
HARRISONBURG DIVISION

UNITED STATES OF AMERICA,

Case No. 5:20 CR 1

AT SW v.
W
SARAH ELIZABETH JOHNSON
W

STATEMENT OF FACTS

This Statement of Facts briefly summarizes the facts and circumstances surrounding the defendant's criminal conduct. It does not necessarily contain all the information obtained during this investigation and applicable to an accurate Presentence Report and Sentencing Guidelines calculation. The offense(s) described below occurred within the Western District of Virginia.

This Statement of Facts is not protected by proffer agreement or any other agreement, and shall be wholly admissible at trial notwithstanding any Rules or statutes to the contrary, including but not limited to, Federal Rules of Evidence 408 and 410, and Federal Rule of Criminal Procedure 11, in the event that the defendant is ultimately charged with and does not plead guilty in connection with the offense(s) outlined below and identified in the plea agreement.

If this matter were to proceed to trial, the United States of America would prove, by relevant and admissible evidence, beyond a reasonable doubt the following:

1. From in our about April 2017 to in or about January 2019 the defendant conspired with other persons to distribute cocaine, cocaine base (also known as crack cocaine), and other controlled substances in and around Winchester, Virginia. The defendant routinely provided on consignment (also known as "fronting") drugs to other individuals for subsequent distribution.
2. With respect to this defendant, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is more than 28 grams of a mixture or substance containing a detectable amount of cocaine base.

3. On April 17, 2018, officers executed a search warrant at the defendant's residence, located on Bellview Avenue, Winchester, Virginia. Officers recovered, among other items, the following items of interest:

- A. Digital scales;
- B. A box of plastic baggies;
- C. Multiple bags containing suspected cocaine and crack cocaine;
- D. Approximately \$4,012;
- E. One .380 magazine with ammunition and one 9mm round.

4. Laboratory analysis of the suspected controlled substances found at the defendant's residence determined that: one bag tested positive for 16.22 grams of cocaine base; one bag (that contained two smaller bags) tested positive for 16.21 grams of cocaine and cocaine base; one bag tested positive for 4.26 grams of fentanyl; one bag tested positive for 9.41 grams of fentanyl; one bag tested positive for 0.40 grams of heroin; and one bag tested positive for 14.12 grams of cocaine.

5. On January 17, 2019, officers, with the assistance of a cooperating individual, purchased a controlled substance from Sarah Johnson in exchange for \$175. The cooperating individual paid Johnson an additional \$45 towards a debt accrued during a previous drug purchase.

I have reviewed the above Statement of Facts with my attorney and I agree that it is true and accurate. I further agree that the above facts are sufficient to convict me of the offense(s) to which I am pleading guilty.

1/14/20

Date

Sarah Walker

Sarah Elizabeth Johnson
Defendant

1/14/20

Date

Andrea Harris

Andrea Harris
Attorney for Defendant